

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. BLACKBAUD, INC., et al., Defendants.	Civ. Action No. 24-03993-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. WHITEPAGES, INC., et al., Defendants.	Civ. Action No. 24-03998-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. HIYA, INC., et al., Defendants.	Civ. Action No. 24-04000-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. ACXIOM, LLC, et al., Defendants.	Civ. Action No. 24-04017-HB

<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>COMMERCIAL REAL ESTATE EXCHANGE, INC., et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04073-HB
<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>CARCO GROUP INC., et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04077-HB
<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>TWILIO, INC., et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04095-HB
<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>6SENSE INSIGHTS, INC., et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04104-HB
<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>LIGHTBOX PARENT, L.P., et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04105-HB

<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>SEARCH QUARRY, LLC, et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04106-HB
<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>ENFORMION, et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04110-HB
<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>COSTAR GROUP, INC., et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04111-HB
<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>ORACLE INTERNATIONAL CORPORATION, et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04112-HB
<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>RED VIOLET, INC., et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04113-HB

<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>RE/MAX, LLC, et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04114-HB
<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>EPSILON DATA MANAGEMENT, LLC, et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04168-HB
<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>PEOPLE DATA LABS, INC., et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04171-HB
<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>CLARITAS, et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04175-HB
<p>ATLAS DATA PRIVACY CORPORATION, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>DATA AXLE, INC., et al.,</p> <p>Defendants.</p>	Civ. Action No. 24-04181-HB

ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. REMINE, INC., et al., Defendants.	Civ. Action No. 24-04182-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. LUSHA SYSTEMS, INC., et al., Defendants.	Civ. Action No. 24-04184-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. TELTECH SYSTEMS, INC., et al., Defendants.	Civ. Action No. 24-04217-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. PEOPLECONNECT, INC., et al., Defendants.	Civ. Action No. 24-04227-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. CORELOGIC, INC., et al., Defendants.	Civ. Action No. 24-04230-HB

ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. BLACK KNIGHT TECHNOLOGIES, LLC, et al., Defendants.	Civ. Action No. 24-04233-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. THOMSON REUTERS CORPORATION, et al., Defendants.	Civ. Action No. 24-04269-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. CHOREOGRAPH LLC, et al., Defendants.	Civ. Action No. 24-04271-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. TRANSUNION, LLC, et al., Defendants.	Civ. Action No. 24-04288-HB

ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. EQUIFAX, INC., et al., Defendants.	Civ. Action No. 24-04298-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. SPOKEO, INC., et al., Defendants.	Civ. Action No. 24-04299-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. TELNYX LLC, et al., Defendants.	Civ. Action No. 24-04354-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. MYHERITAGE, LTD, et al., Defendants.	Civ. Action No. 24-04392-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. WILAND, INC., et al., Defendants.	Civ. Action No. 24-04442-HB

ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. VALASSIS DIGITAL CORP., ET AL., et al., Defendants.	Civ. Action No. 24-04442-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. ATDATA, LLC, et al., Defendants.	Civ. Action No. 24-04447-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. PRECISELY HOLDINGS, LLC, ET AL., et al., Defendants.	Civ. Action No. 24-04571-HB
ATLAS DATA PRIVACY CORPORATION, et al., Plaintiffs, v. OUTSIDE INTERACTIVE, INC., et al., Defendants.	Civ. Action No. 24-04696-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

THE LIFETIME VALUE CO. LLC,
ET AL., et al.,

Defendants.

Civ. Action No. 24-04850-HB

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

FIRST AMERICAN FINANCIAL
CORPORATION ET AL, et al.,

Defendants.

Civ. Action No. 24-05334-HB

CERTIFICATION OF RAJIV D. PARIKH
IN SUPPORT OF PLAINTIFFS' CONSOLIDATED MOTION TO REMAND

I, RAJIV D. PARIKH, an attorney duly admitted to practice law in the United States District Court, District of New Jersey, hereby certify under the penalty of perjury that the foregoing is true and correct:

1. I am a Partner of the law firm of Pem Law LLP, attorneys for Plaintiffs Atlas Data Privacy Corporation ("Atlas"), Jane Doe-1, Jane Doe-2, Edwin Maldonado, Scott Maloney, Justyna Maloney, Patrick Colligan, Peter Andreyev, and William Sullivan (together, "Plaintiffs"), and submit this Certification in support of Plaintiffs' Consolidated Motion to Remand.

2. A true and correct copy of the decision issued by the Appellate Division of the Superior Court of New Jersey in *Kratovil v. City of New Brunswick*, No. A-0216-23, 2024 WL 1826867 (App. Div. Apr. 26, 2024), is attached hereto as **Exhibit A**.

3. On April 18, 2024, the Court held a status conference to address common issues across all of the removed cases, including, among other things, subject matter jurisdiction. A true and correct copy of the Court's April 8, 2024 Order is attached hereto as **Exhibit B**.

4. As a result of the April 18, 2024 status conference, the Court ordered all of the removed cases stayed through May 7, 2024, except as to any motions of Plaintiffs to remand and supporting briefs. A true and correct copy of the Court's April 22, 2024 Order is attached hereto as **Exhibit C**.

5. By way of this Consolidated Motion and pursuant to the Court's instructions at the April 18, 2024 status conference, Atlas is producing an exemplar assignment of claims issued between a covered persons and Atlas. For the privacy of the covered person, Plaintiffs have redacted the personally identifiable information of the covered person in the assignment. A true and correct copy of the Atlas assignment ("Atlas Exemplar Assignment") is attached hereto as **Exhibit D**.

6. By way of this Motion, Atlas is also producing Atlas's Service Terms governing the terms of service between covered persons and Atlas. A true and correct

copy of Atlas’s Daniel’s Law Service Terms, last updated February 4, 2024, (“Atlas Service Terms”) is attached hereto as **Exhibit E**.

7. Atlas was incorporated in 2021 under the laws of the State of Delaware. A true and correct copy of Atlas’s Certificate of Good Standing setting forth these facts is attached hereto as **Exhibit F**.

Executed on May 3, 2024

s/ Rajiv D. Parikh

Rajiv D. Parikh